

Exhibit 11

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Edward Butowsky,

Plaintiff,

v.

David Folkenflik, et al.,

Defendants

Case No. 4:18-cv-00442-ALM

DECLARATION OF EDWARD BUTOWSKY

My name is Edward Butowsky, I am greater than 18 years of age and competent to testify, and I do testify as follows under penalty of perjury under the laws of the United States, as witnessed by my signature below:

I am the Plaintiff in the case identified above.

From my first conversation with Joel and Mary Rich, I agreed to cover the cost of a private investigation into the murder of their son, Seth Rich. I have never hidden the fact that I paid Rod Wheeler to investigate on their behalf, and I mentioned that in the original complaint that I filed in the case identified above.

I paid for Mr. Wheeler's services, I shared tips with him, and I facilitated virtual meetings with him and Malia Zimmerman, but I did not direct or control his investigation. I did not interview any witnesses on Mr. Wheeler's behalf, nor did I accompany him or assist him with any witness interviews. Likewise, I did not tell him what witnesses he should interview.

I did not sue the Defendants in this case for the purpose of silencing them. I sued them because they smeared me, damaged my reputation, and hurt my family and my business.

Contrary to the suggestion of the Defendants, I did not try to conceal Rod Wheeler's relationship with Fox News from the Rich family. As I recall, Joel Rich had already seen Mr. Wheeler on Fox News. I encouraged Mr. Wheeler to downplay his connection with Fox News in order to avoid alienating the Riches.

Whereas Fox News is generally perceived to be conservative / Republican, the Riches are very liberal / Democratic.

I was not involved in the negotiations over the terms of the contract between Mr. Wheeler and the Rich family. Some time around early March of 2017, Mr. Wheeler sent me a copy of his standard retainer contract and I forwarded it to Joel Rich. So far as I know, the standard retainer agreement was never executed. I later learned that Molly Rich, the wife of Aaron Rich, negotiated a different contract with Mr. Wheeler. Around the time Fox News published its story about the Seth Rich investigation, I received a call from MSNBC claiming that I was the person responsible for paying Mr. Wheeler's bill. I had no idea where the MSNBC reporter got that information, but the reporter stated that it was in the contract between Mr. Wheeler and the Rich family. I then looked for the contract in my emails and found it in my spam filter around May 16, 2017. That was the first time

After Sally Davis sent her August 3, 2017 email to Kim Sams and me, our company (Chapwood) persuaded Ms. Davis to remain a customer but with a different advisor. Even so, Chapwood lost millions of dollars in investments from Ms. Davis and I lost income as a direct result

DECLARANT SAYS NOTHING FURTHER.

March 9, 2020

Edward Butowsky

- 2 -

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